

Texas

Naissance Galleria, LLC v. NBK, Cause No. 2023-41091,
pending in the 129th District Court of Harris County, Texas

*Galleria 2425, LLC, Naissance Galleria, LLC and Choudhri
v. NBK*, Adversary Case No. 23-06009, pending in this Court;
and

Choudhri v. NBK and Zaheer, Adversary Case No. 23-03263,
pending in this Court.

3. NBK now seeks an order “staying the pending litigation” listed above, and “establishing an expedited briefing schedule” for parties to seek Bankruptcy Court approval to maintain the currently pending litigation against NBK. (Mot. 3)

4. Choudhri does not oppose this requested relief. While Choudhri objected to both the Plan’s gatekeeping provision and its releases, and entities affiliated with his interests are currently challenging those provisions of the Plan on appeal, subject to those objections, and without waiving same, Choudhri is willing to cooperate with NBK in seeking to stay or abate the above-mentioned litigation while the Court decides any motions seeking gatekeeping approval to maintain that litigation against NBK.

Choudhri also proposes the following briefing schedule for all motions seeking gatekeeping approval: All motions shall be filed on or before November 8, 2024; NBK shall file its Response to the Motion by December 8, 2024; and Plaintiffs shall file any reply by December 20, 2024.

CONCLUSION

For these reasons, Ali Choudhri respectfully requests that this Motion to Enforce the Gate-Keeping Provisions of the Confirmed Chapter 11 Plan be granted; that the parties

cooperate to seek to stay or abate the specific litigation listed above while parties seek gatekeeping approval to maintain that litigation against NBK; and that the briefing schedule listed above be established for all motions seeking such approval.

Respectfully submitted,

/s/

J. Carl Cecere
State Bar No. 13268300
(admitted pro hac vice)
Cecere PC
6035 McCommas Blvd.
Dallas, TX 75206
Telephone: 469-600-9455
ccecere@cecerepc.com

*Counsel for 2425 WL, LLC and
Ali Choudhri*

CERTIFICATE OF SERVICE

The undersigned certifies that on October 9, 2024, a true and correct copy of the foregoing was served via the Court's CM/ECF system to all parties who are deemed to have consented to ECF electronic service, via email and/or U.S. first class mail, postage paid to all counsel in the Pending Actions and listed below, and also by mailing, first class, postage prepaid, to each of the parties on the attached service list.

Matías J. Adrogué
Leila M. El-Hakam
Matías J. Adrogué PLLC
1629 West Alabama Street
Houston, TX 77006
service@mjalawyer.com

Omar Khawaja
Law Offices of Omar Khawaja, PLLC
177 Richmond Ave,
Ste 1065
Houston, TX 77056
omar@attorneyomar.com

Counsel for Naissance Galleria, LLC

Counsel for Naissance Galleria, LLC

Rodney Drinnon
McCathern
Houston 2000 West Loop South
Ste 1850
Houston, TX 77027
rdrinnon@mccathernlaw.com

Melissa S. Hayward
Hayward PLLC
10501 N. Central Expy
Ste 106
Dallas, TX 75231
mhayward@haywardfirm.com

Counsel for Azeemeh Zaheer

*Counsel for Galleria 2425, LLC,
Naissance Galleria, LLC, and Ali
Choudhri*

David Tang
6711 Stella Link #343
West University Place, TX 77005
dtangattorney@gmail.com

Counsel for Azeemeh Zaheer

/s/ J. Carl Cecere

J. Carl Cecere